

Exhibit E

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DAVID B. GOLD
(1926-1994)

May 11, 2007

VIA E-MAIL PDF

Sherry H. Haus, Esq.
Wilmer Cutler Pickering Hale and Dorr LLP
60 State Street
Boston, MA 02109

Re: In re Sonus Networks Litigation

Dear Sherry:

This letter will serve as Lead Plaintiff's written response to your letter dated February 1, 2007 ("February 1 letter") and to memorialize key items we discussed during our conference calls on March 15 and April 13, 2007 and the e-mail exchanges dated March 21, April 30, and May 8, 2007 regarding defendant Sonus Networks, Inc.'s ("Sonus") electronically stored information ("ESI").

As a preliminary matter, we discussed Sonus's ESI during our December 20, 2006 meet and confer teleconference regarding Sonus's responses to Lead Plaintiff's First Set of Document Requests. During that call, Sonus agreed to show Lead Plaintiff its proposed list of search terms before running them against its ESI. However, Mr. Prendergast indicated that Sonus would not necessarily incorporate additional or revised terms provided by Lead Plaintiff.¹ Sonus agreed to consider searching the ESI of persons identified by Lead Plaintiff not already included in Sonus's proposed search list. Sonus also agreed to an ongoing reservation that Lead

¹ Sonus reiterated this stance in Ms. Coffey's March 21 and April 30 emails, and during our April 13 conference call.

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Plaintiff can provide additional names and search criteria on a rolling basis, to be run against Sonus's ESI.

This letter follows the format of your February 1 letter.

A. Documents Collected For Review

To ensure that Lead Plaintiff's position is clear, there is no agreement to limit the search of ESI to the locations identified in Section A of your February 1 letter. Per Sonus's representations on April 13, Sonus has had a "litigation hold" in effect since some time in 2004. Sonus collected the data identified in Paragraphs A.1 and A.2 in 2006 and 2007, and the data identified in Paragraph A.3 was collected in January/February 2004 (specific collection dates were not provided). Some of the ESI collected to date relates to the Relevant Time Period.² However, Sonus acknowledges that ESI that was created and/or existed prior to the litigation hold may have been deleted from Sonus's computer systems. Relevant, responsive data involving or relating to the Relevant Time Period may exist on Sonus's back up tapes/system of its ESI prior to the litigation hold. We trust that as part of Sonus's litigation hold, back up tapes and the ESI on personal hard drives and portable devices (including PDAs, laptops, flash drives and other electronic media) were preserved. The February 1 letter did not mention and we did not discuss during our conference calls whether Sonus inquired if employees worked from home, used personal email accounts outside of their Sonus email, or obtained access to Sonus's network from personal computers. Please confirm if any of these actions were done. If so, please confirm whether such data was preserved.

For ESI collected in 2006-2007 and in January/February of 2004, you confirmed on April 13 that data collected were in the form of forensic images. Since "deletion" of data does not necessarily result in the elimination of data, we expect that the search terms will be run against all ESI that exists on any storage device. Please confirm that your vendor has or will be uploading these recoverable files, file fragments and other data.

On April 13, Ms. Coffey represented that Sonus is obtaining cost estimates to restore back up tapes prior to the litigation hold. Please provide a list of all Sonus back up tapes created from December 31, 2000 through the system back up Sonus claims to have performed in spring of 2004. Ms. Coffey also acknowledged that

² "Relevant Time Period" is defined in Lead Plaintiff's First Set of Document Requests and is discussed on page 5 of this letter.

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Sonus employees were able to save data (including, but not limited to, emails) locally to their hard drives and that counsel would check person-by-person to determine if data was stored locally. Please let us know the results of these efforts and, where data was stored locally, that it will be uploaded and searched for responsive information.

Please provide an update regarding the PDA search identified in Ms. Coffey's April 30, 2007 email. We are also awaiting a further response regarding the company-issued laptops discussed during the April 13 call and whether and when they were preserved.

As for the data collected from the shared drives identified by defense counsel in Paragraph A.2, Lead Plaintiff questioned whether these drives were sufficient. Department drives of persons with responsive information, for example, Vice President Ted Harris or persons within customer support, would not be found on the drives you identified. We trust that since the litigation hold precludes the destruction of data (including Sonus's back up tapes), the ESI was preserved and is available.

For the data collected in January/February 2004 identified in Paragraph A.3, you did not know during our April 13 call how far the data goes back on the identified devices, but agreed to find out and will let us know.

Oracle

We discussed the Oracle database/reporting during both teleconferences. Regarding the volume and location of Oracle reports generated during the Relevant Time Period, you stated that it depended on the employees' practices whether Oracle reports would be saved on a department drive, network file shares, a shared drive, or a local hard drive. According to Ms. Coffey, the Oracle reports are on a drive accessible by all members of the finance department. We then discussed how to identify a report's author if a large amount of reports are located. You will check if there is a way to determine who is responsible for generating or modifying the reports other than the information found in the metadata.

According to Ms. Coffey, Sonus converted its accounting system from Pointman to Oracle in March of 2001. Ms. Coffey stated that it was not a full conversion of all historical data, but was done on an "as-needed" basis. Ms. Coffey further explained that historical data pertaining to particular transactions or customers was uploaded into Oracle, although she did not provide specific examples.

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Your office could not confirm whether Sonus used standard Oracle reports or if it created custom reports, nor was a definitive response provided regarding the location of the Oracle database within Sonus's computer systems. Since you expressed concern about getting "bogged down" in Oracle-related issues, we agreed to table for now Lead Plaintiff's questions regarding the database and the types of reports Sonus runs on Oracle in addition to the similar questions regarding Pointman, Sonus's previous accounting system. However, my understanding is that the Oracle reports found in the ESI identified in your February 1 letter will be loaded and searched now.

B. Proposed Search Queries

Sonus and Lead Plaintiff agreed that the initial search process would be done iteratively. You have confirmed that search terms are not case sensitive, email attachments are searchable, and an "*" denotes a wildcard and will include the root itself. "Hit" reports will be provided to us prior to Sonus's review of the culled ESI. If certain words generate an extremely large number of hits, the parties will discuss possible search query alternatives. As I mentioned during our March 15 call, the use of search terms, rather than queries, may be beneficial.

Both you and Ms. Coffey stated that the proposed search queries attached to the February 1 letter were created by your office based upon Sonus's responses and objections to Lead Plaintiff's first document request. As a result, Sonus's proposed search criteria is quite narrow and limited. Of the 152 document requests in Lead Plaintiff's first set of document requests, Sonus responded as follows:

1. Sonus will produce responsive documents that it deems to be non-privileged to 3 requests;
2. Sonus will not produce *any* documents for 84 of the requests;
3. Sonus narrowly limits the documents it will produce to 30 of the requests based on General Objection Number 1 (in addition to various other objections);
4. Sonus narrowly limits the documents it will produce to 15 of the requests based on Sonus's objection regarding the "restatement" (again, in addition to various other objections); and

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5. Sonus narrowly limits the documents it will produce to the remaining 20 requests based on various other objections and limitations.

Sonus has since proposed, beginning with Ms. Coffey's March 21 email, that Lead Plaintiff provide queries that could identify responsive documents to all of its 152 requests. However, Sonus has stated that it may ignore some or all of the queries, and will not waive any objections for purposes of conducting a search of its ESI. Essentially, Sonus's proposed compromise would allow it to create its own document requests, and then respond within the scope, time frame, and limitations of its own choosing. Lead Plaintiff declines to accept this offer, as it is not a good faith effort to resolve the discovery issues discussed during our December 20, 2006 meet and confer teleconference. If Sonus reconsiders its position or a court orders additional searches to be performed on Sonus's ESI, Ms. Gulino confirmed during our April 13 call that de-duplication can easily be done to limit the results to only the newly-identified documents. Lead Plaintiff anticipates moving to compel Sonus to produce documents that it is withholding.

According to you and Ms. Coffey, the numeric ranges to limit the number of words between search terms within Sonus's proposed search queries – identified as "w/____" – were chosen based on how common the search terms were an effort to avoid production of irrelevant documents. This approach does not seem to be rooted in testing against the content of Sonus's documents. As we mentioned during our March 15 call, we found an example of a previously-produced document where the two words in a proposed search query were more than 50 words apart. Another example of where the proposed criteria is inadequate can be found in Sonus's proposed search query number 3, identified as "org*" w/2 ("chart*" OR "structure"). During our March 15 conference call, you mentioned that this query was in response to Lead Plaintiff's document request number one, which asked for all documents describing or depicting Sonus's organizational structure. However, the CD provided to Lead Plaintiff in January 2007 containing copies of recently-prepared Powerpoint documents evidencing Sonus's organization did not contain the word "chart" or "structure" in them. While some of the *file names* contained the word "chart," not all of them did. Further, we do not know whether use of file names will even generate "hits" within your vendor's system. The result is that responsive, discoverable documents will be excluded based Sonus's proposed parameters.

We also discussed Lead Plaintiff's request number 2 seeking all documents identified on Sonus's Initial Disclosures. Again, the broad categories Sonus identified are insufficient for Lead Plaintiff to provide meaningful suggestions for the search of the ESI. Sonus possesses all of its responsive documents, in all

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formats, and is therefore in the best position to know whether the search queries run against its ESI will produce responsive documents that comply with Lead Plaintiff's requests.

To sum up, while Lead Plaintiff is willing to review Sonus's proposed search queries and provide suggestions, this is not intended to alleviate Sonus's duty to conduct a diligent and proper search of its ESI to response to Lead Plaintiff's discovery requests. Attached is a copy of the search query list included with your February 1 letter with our proposed changes.

Additional Custodians

Attached is a document entitled "Additional Custodians" identifying an initial list of persons Lead Plaintiff believes should be included on the list identified in Paragraph A.1 of your February 1 letter. If ESI for these individuals is not on the email servers, hard drives, network file shares, shared drives, or on any other storage device that you have previously identified, we expect that the ESI for these persons will be uploaded prior to applying the search terms and queries. As with the search query and term list, the additional custodian list is not intended to alleviate Sonus's discovery obligations.

Relevant Time Period

The proposed date ranges set forth in Ms. Coffey's April 30, 2007 email are inadequate. The relevant time period is defined on page 5 of Lead Plaintiff's First Set of Document Requests as follows:

The relevant time period for these requests is January 1, 2001 to the present. These requests seek DOCUMENTS created or generated during this period, as well as **DOCUMENTS created or generated outside this period but which contain information RELATING TO the relevant time period.**

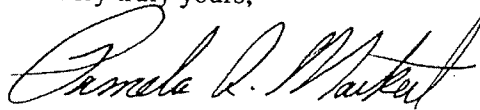
There is no distinction for the above time period between hard copy documents and ESI. Therefore, we expect Sonus will search its ESI in accordance with the Relevant Time Period.

If you have questions about any of the statements contained in this letter or with the enclosed attachments, please contact me so that we can arrange a

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teleconference. Otherwise, we look forward to receiving the initial "hit" report as soon as possible.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Pamela A. Markert".

Pamela A. Markert

PAM:keg
#117061
Enclosures

cc: Solomon B. Cera, Esq.
Kenneth A. Frost III, Esq.
James W. Prendergast, Esq.
Melissa B. Coffey, Esq.

IN RE SONUS NETWORKS INC. LITIGATION

ADDITIONAL CUSTODIANS

Abreu, Pamela	Mayersohn, Jeffrey ("Jeff")
Ansari, Hamid	McDermott, Michelle
Ansari, Anousheh	McManus, Phillip ("Phil")
Anzivino, Anthony ("Tony")	McMullin, Bob
Brown, Steve	Miller, Bradley ("Brad")
Collins, Stephen ("Steve")	Morrison, Duayne
Crowe, William ("Bill")	Morrissey, Beth
Cunningham, John	Mortimer, Catherine ("Cathy")
Czekala, Katherine ("Kathy")	O'Hara, Michael ("Mike")
Eastep, Michael ("Mike")	Ortega, Benjamin ("Ben")
Epstein, Andrew ("Andy")	Philbrook, Jocelyn (Lynds, Jocelyn)
Ferri, Paul	Pratt, Eric
Foster, Wayne	Richards, Richard ("Dick")
Goswami, Deb	Rifkin, Bernie
Gray, Charles ("Charlie")	Robinson, Deryck
Hamid, John	Rubin, Michael ("Mike")
Harris, Edward ("Ted")	Sadowski, Bryan
Hluchyj, Michael ("Mike")	Severino, Paul
Huang, James ("Jim")	Sharpe, Richard ("Rich")
Humpfrey, Carol (or Colleen)	Sibille, Blane
Jones, Paul	Stovenour, Michael (Stovenow) ("Mike")
Kendall, Jan	Swango, Michael ("Mike")
Klerkowski, Jon	Thompson, H. Brian
Lankiewicz, Victoria ("Tory")	Todisco, Lawrence ("Larry")
Mainor, William ("Will")	Walker, Mark
Mattson, Ron	Wong, Kwok

IN RE SONUS NETWORKS, INC. SECURITIES LITIGATION

PROPOSED SEARCH QUERIES

1. All files with Powerpoint file extensions (*.pps and *.ppt)
2. All relevant documents and tangible things Sonus identified on its Initial Disclosures
3. All Oracle Reports using the file prefix or suffix designations used by Sonus and/or imposed by Oracle.
4. All documents contained in any electronic personnel files for the individual defendants and Peter Hemme.
5. ("Sonus" AND "Org*")
6. ("press" AND "release*")
7. ("investig*" AND "account*")
8. ("Audit Committee")
9. ("Board" AND "Meet*")
10. (("Board*" OR "bd*" OR "Dir*" OR "committee*" OR "cmt*") AND ("Meet*" OR "Mtg*" OR "confer*"))
11. ("investiga*")
12. ("intern*" AND "investiga*")
13. ("control*" AND "fraud*")
14. (("scrub*" OR "delet*" OR "clean*" OR "clear*" OR "eras*" OR "swip*") AND ("driv*" OR "comput*" OR "hard" OR "floppy" OR "disk*" OR "CD*" OR "DVD*" OR "backup*" OR "back-up*" OR "tap*" OR "server*" OR "Peter" OR "Hemme" OR "control*"))
15. ("fraud*")
16. ("fraud" AND "consid*")
17. ("intern*" w/50 "control*")
18. ("intern*" w/50 "proced*")
19. ("intern*" w/50 "fraud*")
20. ("manip*" OR "modif*" OR "timi*" OR "time*" OR "shift*")

21. ("accept*" OR "confirm*")
22. (("prepar*" OR "file*" OR "filed" OR "filing" OR "creat*" OR "manip*" OR "revis*" OR "review*" OR "analy*" OR "destr*" OR "complet*" OR "organi*" OR "send*" OR "sent*" OR "email*" OR "e-mail*" OR "distr*" OR "announc*" OR "submit*" OR "resubmit*" OR "re-submit*" OR "delet*" OR "adjust*" OR "modif*" OR "manip*") AND ("financ*" OR "state*" OR "stmt*" OR "number*" OR "book*" OR "reven*" OR "sale*" OR "sold" OR "selling" OR "earn*" OR "unearn*" OR "defer*" OR "incom*" OR "result*"))
23. (("restat*" OR "re-stat*" OR "restmt*" OR "re-stmt*" OR "revis*" OR "review*" OR "modif*" OR "adjust*" OR "manip*" OR "refil*" OR "re-fil*" OR "usurp*" OR "superced*" OR "supersed*") AND ("financ*" OR "stat*" OR "stmt*" OR "number*" OR "book*" OR "reven*" OR "sale*" OR "sold" OR "selling" OR "earn*" OR "unearn*" OR "defer*" OR "incom*" OR "result*"))
24. (("intern*" OR "audit*" OR "staff*" OR "finance*" OR "account*" OR "acct*" OR "committee*" OR "cmt*" OR "draft*" OR "fraud*" OR "control*" OR "restatem*" OR "re-statem*" OR "adjust*") AND ("memo*" OR "analy*" OR "report*" OR "review*" OR "survey*" OR "outlin*" OR "out-lin*" OR "strateg*" OR "tactic*" OR "talking point*" OR "tlkg p*" OR "tkg p*" OR "talking-p*" OR "talkingp*"))
25. (("comm*" OR "email*" OR "e-mail*" OR "send*" OR "sent*" OR "repl*" OR "forward*" OR "distrib*" OR "review*" OR "analy*" OR "get back*" OR "get-back*" OR "approv*" OR "deny*" OR "denies" OR "denied" OR "denial" OR "provi*" OR "exchang*" OR "adjust*" OR "modif*" OR "shift*" OR "chang*" OR "switch*" OR "manip*" OR "former*" OR "ex*" OR "prev*" OR "prior*" OR "then*" OR "outgo*" OR "out-go*" OR "retir*" OR "terminat*" OR "fire*" OR "fires" OR "firing" OR "can*" OR "resig*" OR "curren*" OR "present*" OR "now*" OR "exist*") AND ("account*" OR "acct*" OR "pract*" OR "number*" OR "reven*" OR "earn*" OR "incom*" OR "sale*" OR "sold" OR "selling" OR "fraud*" OR "side" OR "bundl*"))
26. (("Ernst & Young*" OR "Ernst*" OR "EandY*" OR "E and Y*" OR "E+Y*" OR "E + Y*" OR "E/Y*" OR "E / Y*" OR "EY*" OR "E&Y*" OR "E & Y*" OR "*ey.com" OR *[names of each E&Y engagement team member and partner(s) during the Relevant Time Period – to be completed by Sonus]*) AND ("memo*" OR "letter*" OR "correspond*" OR "e-mail*" OR "email*" OR "checklist*" OR "attach*" OR "analy*" OR "scop*" OR "engag*" OR "bill*" OR "invoic*" OR "payment*" OR "check*" OR "audit*" OR "compil*" OR "meet*" OR "mtg*" OR "confer*" OR "tele*" OR "disagr*" OR "delin*" OR "refus*" OR "termin*" OR "ceas*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "ICFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "spread*"))
27. ("Huron" OR "*huronconsultinggroup.com" OR "Joe*" OR "Floyd" OR *[names of each Huron owner, member, consultant, employee, and/or contractor during the Relevant*

- Time Period – to be completed by Sonus*) AND (“memo*” OR “letter*” OR “correspond*” OR “e-mail*” OR “email*” OR “checklist*” OR “attach*” OR “analy*” OR “scop*” OR “engag*” OR “bill*” OR “invoic*” OR “payment*” OR “check*” OR “audit*” OR “compil*” OR “meet*” OR “mtg*” OR “confer*” OR “tele*” OR “disagr*” OR “delin*” OR “refus*” OR “termin*” OR “ceas*” OR “irreg*” OR “fraud*” OR “de-fraud*” OR “defraud*” OR “misconduct*” OR “illeg*” OR “improp*” OR “ICFC” OR “control*” OR “misstat*” OR “mis-stat*” OR “mistat*” OR “miss-stat*” OR “classif*” OR “mis-classif*” OR “mistak*” OR “misrep*” OR “mis-rep*” OR “mislead*” OR “mis-lead*” OR “hid*” OR “deceiv*” OR “disguis*” OR “spread*”))
28. ((“supp*” OR “sid*” OR “paral*” OR “parral*” OR “follow*” OR “fellow*” OR “extra*” OR “add*” OR “hid*” OR “secret*” OR “clandest*” OR “unknow*” OR “un-know*” OR “invisib*” OR “ghos*” OR “blind*” OR “post*” OR “pre*” OR “superced*” OR “supersed*” OR “bonus*” OR “bogus*” OR “trump*” OR “aband*”) AND (“agree*” OR “agmt*” OR agrmt*” OR “contrac*” OR “compac*” OR “term*” OR “condit*” OR “letter*” OR “lettr*” OR “ltr*” OR “settl*” OR “comprom*” OR “reach*”))
29. ((“*haledorr.com” OR “*wilmerhale.com” OR “Hale and Do*” OR “Hale & Do*” OR “Hale + Do*” OR “Wilmer Hale*” OR “WH*” OR “Prendergast*” OR “Rudman*” OR “Haus*” OR “Coffey*” OR “Gray*” OR “Grey*” OR “attorney*” OR “counsel*” OR “council*” OR “council*” OR “lawyer*” OR “legal*” OR *[names of each attorney involved with the investigation working or consulting with Hale and Dorr and/or Wilmer Hale]*) AND (“send*” OR “sent*” OR “distrib*” OR “e-mail*” OR “email*” OR “mail*” OR “recei*” OR “recip*” OR “generat*” OR “creat*” OR “build*” OR “develop*” OR “propos*” OR “FedEx*” OR “fed-ex*” OR “fed ex*” OR “UPS” OR “DHL” OR “courier*” OR “fil*” OR “stat*” OR “re-stat*” OR “restat*” OR “re-stat*” OR “restmt*” OR “re-stmt*” OR “account*” OR “acct*” OR “irreg*” OR “improp*” OR “investiga*” OR “fraud*” OR “control*” OR “ctrl*” OR “misstat*” OR “mis-stat*” OR “misstmt*” OR “mis-stmt*” OR “mislead*” OR “mis-lead*” OR “decept*”))
30. ((“Andersen*” OR “Arthur Andersen” OR “*arthurandersen.com” OR *[names of each Arthur Andersen engagement team member and partner(s) during the Relevant Time Period – to be completed by Sonus]*) AND (“memo*” OR “letter*” OR “correspond*” OR “e-mail*” OR “email*” OR “checklist*” OR “attach*” OR “analy*” OR “scop*” OR “engag*” OR “bill*” OR “invoic*” OR “payment*” OR “check*” OR “audit*” OR “compil*” OR “meet*” OR “mtg*” OR “confer*” OR “tele*” OR “disagr*” OR “delin*” OR “refus*” OR “termin*” OR “ceas*” OR “irreg*” OR “fraud*” OR “de-fraud*” OR “defraud*” OR “misconduct*” OR “illeg*” OR “improp*” OR “ICFC” OR “control*” OR “misstat*” OR “mis-stat*” OR “mistat*” OR “miss-stat*” OR “classif*” OR “mis-classif*” OR “mistak*” OR “misrep*” OR “mis-rep*” OR “mislead*” OR “mis-lead*” OR “hid*” OR “deceiv*” OR “disguis*” OR “spread*”))
31. ((“PricewaterhouseCoop*” OR “PwC” OR “*pwc.com” OR *[names of each PricewaterhouseCoopers engagement team member and partner(s) during the Relevant Time Period – to be completed by Sonus]*) AND (“memo*” OR “letter*” OR “correspond*” OR “e-mail*” OR “email*” OR “checklist*” OR “attach*” OR “analy*”

OR "scop*" OR "engag*" OR "bill*" OR "invoic*" OR "payment*" OR "check*" OR "audit*" OR "compil*" OR "meet*" OR "mtg*" OR "confer*" OR "tele*" OR "disagr*" OR "delin*" OR "refus*" OR "termin*" OR "ceas*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "ICFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "spread*"))

32. (("Qwest" OR "Quest" OR "Qwets*" OR "Quets*") w/50 AND ("revenue*" OR "recogni*" OR "accept*" OR "defer*" OR "upgrade*" OR "ship*" OR "maintenance" OR "rev*" OR "purchas*" OR "buy*" OR "agree*" OR "contract*" OR "compl*" OR "fraud*" OR "fail*" OR "intern*" OR "settle*" OR "breach*" OR "settlement agree*" OR "audit*" OR "early" OR "prematur*" OR "improper*" OR "impropr*" OR "wrong*" OR "mistak*" OR "error*" OR "illeg*" OR "ICFC" OR "conflict*" OR "partial*" OR "book*" OR "accounted" OR "purchase order" OR "invoic*" OR "PO" OR "P.O." OR "software" OR "updat*" OR "letter agree*" OR "transact*" OR "erroneous*" OR "incorrect*" OR "access site*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "inten*" OR "circumven*" OR "account*" OR "acct*" OR "financ*" OR "maint*" OR "carv*" OR "settl*" OR "specif*" OR "upgrad*" OR "right*" OR "accept*" OR "confirm*" OR "recog*" OR "instal*" OR "SOP 97-2" OR "SOP 98-9" OR "S.O.P. 97-2" OR "S.O.P. 98-9" OR "97-2" OR "97.2" OR "97(2)" OR "972" OR "98-9" OR "98.9" OR "98(9)" OR "989" OR "procur*" OR "agree*" OR "agmt*" OR "agrm't*" OR "compact*" OR "condit*" OR "sid*" OR "persuad*" OR "suggest*" OR "languag*" OR "letterhead*" OR "letter-head*" OR "letter head*" OR "classif*" OR "misclassif*" OR "mis-classif*" OR "treat*" OR "adjust*" OR "alter*" OR "modif*" OR "manip*" OR "mislead*" OR "mis-lead*" OR "deceiv*" OR "decept*" OR "hid*" OR "disguis*" OR "ghos*" OR "invisib*" OR "irreg*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "improp*" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "deliv*" OR "undeliv*" OR "ship*" OR "incompl*" OR "bundl*" OR "unbundl*" OR "un-bundl*" OR "sever*" OR "element*" OR "component*" OR "part*" OR "futur*" OR "past*" OR "sched*" OR "post*" OR "clos*" OR "tim*" OR "shift*" OR "mov*" OR "push*" OR "pull*" OR "nudg*" OR "stick*" OR "plac*" OR "drawer*" OR "fil*" OR "shel*" OR "wait*" OR "delay*" OR "hold*" OR "held*" OR "check*" OR "receipt*" OR "money*" OR "revenu*" OR "incom*" OR "terminat*" OR "fir*" OR "hir*" OR "dismiss*" OR "leav*" OR "resign*" OR "transfer*" OR "let go*" OR "let-go*" OR "reduc*" OR "control*" OR "Peter" OR "Hemme" OR "CFO" OR "C.F.O." OR "Chief Financial Officer*" OR "Vice President*" OR "V.P." OR "VP" OR "Steve" OR "Stephen" OR "Nill" OR "CEO" OR "C.E.O." OR "Presid*" OR "Chair*" OR "Board*" OR "Hassan" OR "Ahmed" OR "Eric" OR "Pratt" OR "Cliff" OR "Clifford" OR "William" OR "Will" OR "Bill" OR "Mainor" OR "Phil*" OR "Bronsdon" OR "Michael" OR "Mike" OR "Perusse" OR "Perrusse" OR "Perusse" OR "Perussi" OR "Heidi" OR "Carter" OR "point*" OR "gopher*" OR "Foreign Motors West" OR "dealership*" OR "car*" OR "auto*" OR "sedan*" OR "coup*" OR "roadster*" OR "Mercedes*" OR "BMW*" OR "B.M.W." OR "beemer*" OR "SUV*" OR "S.U.V." OR "customer*" OR "press release*" OR "dat*" OR "backdat*" OR "back-dat*" OR "back dat*" OR "backfil*" OR

"back-fil*" OR "back fil*" OR "prior*" OR "before*" OR "after*" OR "subsequent*" OR "adequ*" OR "inadequ*" OR "reserv*" OR "scor*" OR "cushion*" OR "featur*" OR "releas*" OR "version*" OR "platform*" OR "plat-form*" OR "plat form*" OR "produc*" OR "roadmap*" OR "road map*" OR "road-map*" OR "securit*" OR "stock*" OR "shar*" OR "equit*" OR "option*" OR "in-the-money" OR "in the money" OR "cheap stock*" OR "cheap-stock*" OR "cheapstock*" OR "award*" OR "reward*" OR "grant*" OR "bonus*" OR "mileston*" OR "mile-ston*" OR "requir*" OR "IRU" OR "I.R.U." OR "indefeasible right*" OR "Broadband Util*" OR "BBU" OR "B.B.U." OR "BU" OR "B.U." OR "Ansari" OR "Hamid" OR "Securities and Exchange Commission" OR "S.E.C." OR "SEC" OR "commission*" OR "agenc*" OR "Department of Just*" OR "Dep't. of Just*" OR "Dept. of Just*" OR "Dept of Just*" OR "D.O.J." OR "DOJ*" OR "NASD*" OR "N.A.S.D.*" OR "initial public offering*" OR "I.P.O." OR "IPO" OR "scrub*" OR "eras*" OR "clean*" OR "clear*" OR "delet*" OR "destr*" OR "irreg*" OR "bump*" OR "jagg*" OR "rough*" OR "smooth*" OR "erratic*" OR "inconsist*" OR "incent*" OR "consid*" OR "memo*" OR "empt*" OR "legal*" OR "miss*" OR "contin*" OR "earn*" OR "unearn*" OR "s/w*" OR "h/w*" OR "hardwar*" OR "Ernst & Young*" OR "Ernst*" OR "EandY*" OR "E and Y*" OR "E+Y*" OR "E + Y*" OR "E/Y*" OR "E / Y*" OR "EY*" OR "E&Y*" OR "E & Y*" OR "*ey.com" OR "Andersen*" OR "Arthur Andersen" OR "*arthurandersen.com" OR "Huron" OR "*huronconsultinggroup.com" OR "PricewaterhouseCoop*" OR "PwC" OR "*pwc.com"))

33. ((("AT&T" OR "ATT" OR "ATWS" OR "AT and T" OR "ATandT" OR "AWS" OR "ATTWS" OR "A T and T" OR "A T & T" OR "AT+T" OR "A T + T" OR "AT&TW*" OR "ATTW*" OR "AT+TW*" OR "Wireless" OR "Wire-less") w/50 AND ("revenue*" OR "recogni*" OR "accept*" OR "defer*" OR "upgrade*" OR "ship*" OR "maintenance" OR "rev*" OR "purchas*" OR "buy*" OR "agree*" OR "contract*" OR "compl*" OR "fraud*" OR "fail*" OR "impropr*" OR "wrong*" OR "mistak*" OR "error*" OR "illeg*" OR "ICFC" OR "conflict*" OR "intern*" OR "settle*" OR "breach*" OR "settlement agree*" OR "audit*" OR "early" OR "prematur*" OR "improper*" OR "partial*" OR "book*" OR "accounted" OR "purchase order" OR "invoic*" OR "PO" OR "P.O." OR "software" OR "updat*" OR "letter agree*" OR "transact*" OR "erroneous*" OR "incorrect*" OR "feature request*" OR "F.R.*" OR "FR*" OR "technology commitment letter*" OR "T.C.L.*" OR "TCL*" OR "lab equip*" OR "useful li*" OR "equipment li*" OR "gate six" OR "gate-six" OR "gate 6" OR "gate 6" OR "gate6" OR "gatesix" OR "LA Softswitch" OR "LA" OR "L.A." OR "local access*" OR "local-access*" OR "Los Angeles" OR "Louisiana" OR "Tandem*" OR "National" OR "LD" OR "L.D." OR "L-D" OR "long dist*" OR "long-dist*" OR "GSM-MAP" OR "MAP*" OR "ANSI-41" OR "ANSI 41" OR "ANSI41" OR "spar*" OR "Commerce" OR "Anaheim" OR "project*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "inten*" OR "circumven*" OR "account*" OR "acct*" OR "financ*" OR "maint*" OR "carv*" OR "settl*" OR "specif*" OR "upgrad*" OR "right*" OR "accept*" OR "confirm*" OR "recog*" OR "instal*" OR "SOP 97-2" OR "SOP 98-9" OR "S.O.P. 97-2" OR "S.O.P. 98-9" OR "97-2" OR "97.2" OR "97(2)" OR "972" OR "98-9" OR "98.9" OR "98(9)" OR "989" OR "procur*" OR "agree*" OR "agmt*" OR "agrm't*" OR "compact*" OR "condit*" OR "sid*" OR "persuad*" OR "suggest*" OR "languag*" OR "letterhead*" OR "letter-head*" OR "letter head*" OR "classif*" OR

"misclassif*" OR "mis-classif*" OR "treat*" OR "adjust*" OR "alter*" OR "modif*" OR "manip*" OR "mislead*" OR "mis-lead*" OR "deceiv*" OR "decept*" OR "hid*" OR "disguis*" OR "ghos*" OR "invisib*" OR "irreg*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "improp*" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "deliv*" OR "undeliv*" OR "ship*" OR "incompl*" OR "bundl*" OR "unbundl*" OR "un-bundl*" OR "sever*" OR "element*" OR "component*" OR "part*" OR "futr*" OR "past*" OR "sched*" OR "post*" OR "clos*" OR "tim*" OR "shift*" OR "mov*" OR "push*" OR "pull*" OR "nudg*" OR "stick*" OR "plac*" OR "drawer*" OR "fil*" OR "shel*" OR "wait*" OR "delay*" OR "hold*" OR "held*" OR "check*" OR "receipt*" OR "money*" OR "revenu*" OR "incom*" OR "terminat*" OR "fir*" OR "hir*" OR "dismiss*" OR "leav*" OR "resign*" OR "transfer*" OR "let go*" OR "let-go*" OR "reduc*" OR "control*" OR "Peter" OR "Hemme" OR "CFO" OR "C.F.O." OR "Chief Financial Officer*" OR "Vice President*" OR "V.P." OR "VP" OR "Steve" OR "Stephen" OR "Nill" OR "CEO" OR "C.E.O." OR "Presid*" OR "Chair*" OR "Board*" OR "Hassan" OR "Ahmed" OR "Eric" OR "Pratt" OR "Cliff" OR "Clifford" OR "Joe*" OR "Joseph" OR "Mueller" OR "Dav*" OR "Saska" OR "Robert" OR "Rob" OR "Bob" OR "Bortoff" OR "Nancy" OR "Foster" OR "Chistian" OR "Chris*" OR "Syberg" OR "Foreign Motors West" OR "dealership*" OR "car*" OR "auto*" OR "sedan*" OR "coup*" OR "roadster*" OR "Mercedes*" OR "BMW*" OR "B.M.W.*" OR "beemer*" OR "SUV*" OR "S.U.V.*" OR "customer*" OR "press release*" OR "dat*" OR "backdat*" OR "back-dat*" OR "back dat*" OR "backfil*" OR "back-fil*" OR "back fil*" OR "prior*" OR "before*" OR "after*" OR "subsequent*" OR "adequ*" OR "inadequ*" OR "reserv*" OR "scor*" OR "cushion*" OR "featur*" OR "releas*" OR "version*" OR "platform*" OR "plat-form*" OR "plat form*" OR "produc*" OR "roadmap*" OR "road map*" OR "road-map*" OR "securit*" OR "stock*" OR "shar*" OR "equit*" OR "option*" OR "in-the-money" OR "in the money" OR "cheap stock*" OR "cheap-stock*" OR "cheapstock*" OR "award*" OR "reward*" OR "grant*" OR "bonus*" OR "mileston*" OR "mile-ston*" OR "requir*" OR "Securities and Exchange Commission" OR "S.E.C." OR "SEC" OR "commission*" OR "agenc*" OR "Department of Just*" OR "Dep't. of Just*" OR "Dept. of Just*" OR "Dept of Just*" OR "D.O.J." OR "DOJ*" OR "NASD*" OR "N.A.S.D.*" OR "initial public offering*" OR "I.P.O." OR "IPO" OR "scrub*" OR "eras*" OR "clean*" OR "clear*" OR "delet*" OR "destr*" OR "irreg*" OR "bump*" OR "jagg*" OR "rough*" OR "smooth*" OR "erratic*" OR "inconsist*" OR "incent*" OR "consid*" OR "memo*" OR "empt*" OR "legal*" OR "miss*" OR "contin*" OR "earn*" OR "unearn*" OR "s/w*" OR "h/w*" OR "hardwar*" OR "Ernst & Young*" OR "Ernst*" OR "EandY*" OR "E and Y*" OR "E+Y*" OR "E + Y*" OR "E/Y*" OR "E / Y*" OR "EY*" OR "E&Y*" OR "E & Y*" OR "*ey.com" OR "Andersen*" OR "Arthur Andersen" OR "*arthurandersen.com" OR "Huron" OR "*huronconsultinggroup.com" OR "PricewaterhouseCoop*" OR "PwC" OR "*pwc.com"))

34. ("org*" w/2 ("chart*" OR "structure*)) [see discussion in May 11, 2007 letter]

35. ("employee*" w/2 ("handbook*" OR "manual*))

36. ("operat*" w/5 ("proced*" OR "manual*"))
37. ("accounting" w/5 ("proced*" OR "polic*" OR "manual*"))
38. (("employee*" OR "employ*" OR "operat*" OR "accounting" OR "acctg*" OR "person*") AND ("handbook*" OR "manual*" OR "proced*" OR "polic*" OR "pract*"))
39. (("revenue" w/5 w/25 "recog*") w/15 AND ("polic*" OR "proced*" OR "account*" OR "practice*" OR "compl*" OR "noncompl*" OR "non-compl*" OR "fail*" OR "lack*" OR "fraud" OR "misstate*" OR "faulty" OR "improp*"))
40. (("defer*" w/5 "revenue") w/15 ("polic*" OR "proced*" OR "account*" OR "practice*"))
41. (("ship*" w/10 "revenue") w/15 ("polic*" OR "proced*" OR "account*" OR "practice*"))
42. (("multiple" w/5 "element") w/15 ("polic*" OR "proced*" OR "account*" OR "practice*"))
43. (~~("agree*" OR "arrang*" OR "contract") w/25~~ ("hardware" OR "software" OR "h/w*" OR "s/w*") w/25 AND ("bundl*" OR "unbundl*" OR "un-bundl*" OR "segregat*" OR "separat*")) w/25 (~~("polic*" OR "proced*" OR "account*" OR "practice*")~~)
44. ("97-2" OR "SAB104" OR "98-9" OR "97(2)" OR "972" OR "97.2" OR "98(9)" OR "989" OR "98.9")
45. (("press release* OR "PR") w/50 AND (("financial" w/10 ("results" OR "statement*") w/20 AND ("restat*" OR "revis*" OR "adjust*")) OR ("accounting" w/10 ("practic*" OR "polic*" OR "proc*"))))
46. ("10Q" OR "10-Q" OR "10Q/A" OR "10QA" OR "10-QA")
47. ("10K" OR "10-K")
48. ("10KA" OR "10-K/A" OR "10-KA")
49. ("Form 3")
50. ("Form 4")
51. ("Form 5")
52. ("8K" OR "8-K")
53. ("424B5" OR "424-B-5" OR "424-B5" OR "424B-5" OR "424(b)(5)")
54. ("S-8" OR "S8")

55. ((("prospectus*" OR "supplement*" OR "offering*" OR "follow on" OR "follow-on" OR "followon") w/50 AND ((("4/23" OR "04/23" OR "4-23" OR "04-23" OR "4/23/03" OR "04/23/03" OR "4-23-03" OR "04-23-03" OR "4/23/2003" OR "04/23/2003" OR "4-23-2003" OR "04-23-2003" OR "April 23*" OR "Apr. 23*") OR ("goldman" OR "sachs" OR "GS" OR "G.S." OR "*goldmansachs.com" OR "analy*" OR "stock*" OR "capital")))))
56. ((("prospectus*" OR "supplement*" OR "offering*" OR "follow on" OR "follow-on" OR "followon") w/50 AND ((("9/23" OR "09/23" OR "9-23" OR "09-23" OR "9/23/03" OR "09/23/03" OR "9-23-03" OR "09-23-03" OR "09/23/2003" OR "9-23-2003" OR "09-23-2003" OR "September 23*" OR "Sept. 23*") OR ("goldman" OR "sachs" OR "GS" OR "G.S." OR "*goldmansachs.com" OR "analy*" OR "stock*" OR "capital")))))
57. ((("rais*" OR "bring* in" OR "obtain*" OR "procur*" OR "get*") w/5 "capital") AND ~~(Date>2003)~~ [Lead Plaintiff does not agree to date restriction.]
58. ((("Ernst & Young" OR "Ernst" OR "EandY*" OR "EY*" OR "E&Y*") w/15 AND ((("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*" OR "sale*") w/10-AND ((("stock*" OR "share*") w/10 AND "Sonus")))))
59. ("Andersen" w/15 AND ((("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*") w/10-AND ((("stock*" OR "share*") w/10-AND "Sonus")))))
60. ("Huron" w/15 AND ((("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*") w/10-AND ((("stock*" OR "share*") w/10-AND "Sonus")))))
61. ((("Wilmer*" OR "Hale*" OR "WH" OR "HD" OR "H&D" OR "WCPHD") w/15 AND ((("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*") w/10-AND ((("stock*" OR "share*") w/10-AND "Sonus")))))
62. ((("Ernst & Young" OR "Ernst" OR "EandY" OR "EY" OR "E&Y") w/15 AND ("invoice*" OR "bill*" OR "pay*" OR "engag*" OR "retain*" OR "term*" OR "indemni*" OR "condition*")))
63. ("Andersen" w/15 AND ("invoice*" OR "bill*" OR "pay*" OR "engag*" OR "retain*" OR "term*" OR "indemni*" OR "condition*"))
64. ("Huron" w/15 AND ("invoice*" OR "bill*" OR "pay*" OR "engag*" OR "retain*" OR "term*" OR "indemni*" OR "condition*"))
65. ((("Ernst & Young" OR "Ernst" OR "EandY" OR "EY" OR "E&Y") w/15 "Restat*") AND ~~(Date=2004)~~ [Lead Plaintiff does not agree to date limitation.]
66. ((("Ernst & Young" OR "Ernst" OR "EandY" OR "EY" OR "E&Y") w/25 ("Qwest" OR "Quest*")) AND ~~(Date=2004)~~ [Lead Plaintiff does not agree to date limitation.]

67. (("Ernst & Young" OR "Ernst" OR "EandY" OR "EY" OR "E&Y") w/25 ("AT&T" OR "ATT" OR "ATWS" OR "AT and T" OR "ATandT" OR "AWS" OR "ATTWS")) AND (~~Date=2004~~) [Lead Plaintiff does not agree to date limitation.]
68. ("Andersen" w/15 AND "Restat*")
69. ("Andersen" w/15 AND ("Qwest" OR "Quest"))
70. ("Andersen" w/15 AND ("AT&T" OR "ATT" OR "ATWS" OR "AT and T" OR "ATandT" OR "AWS" OR "ATTWS"))
71. (("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/15 AND ("subpoena*" OR "request*" OR "interview*" OR "testi*" OR "investig*" OR "witness" OR "depo*" OR "restat*" OR "re-stat*" OR "inqui*" OR "review*" OR "disclo*" OR "Hass*" OR "Ahmed" OR "Stephen" OR "Steve" OR "Steven" OR "Nill" OR "memo*" OR "letter*" OR "correspond*" OR "e-mail*" OR "email*" OR "checklist*" OR "attach*" OR "analy*" OR "scop*" OR "engag*" OR "bill*" OR "invoic*" OR "payment*" OR "check*" OR "audit*" OR "compil*" OR "meet*" OR "mtg*" OR "confer*" OR "tele*" OR "disagr*" OR "delin*" OR "refus*" OR "termin*" OR "ceas*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "ICFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "spread*"))
72. (("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/15 AND ("subpoena*" OR "request*" OR "interview*" OR "testi*" OR "investig*" OR "witness" OR "depo*" OR "inqui*" OR "review*" OR "disclo*") AND ("Hass*" OR "Ahmed" OR "Stephen" OR "Steve" OR "Steven" OR "Nill"))
73. (("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/15 AND ("subpoena*" OR "request*" OR "interview*" OR "testi*" OR "investig*" OR "witness" OR "depo*" OR "inqui*" OR "review*" OR "disclo*") AND ("Pet*" OR "Hemme" OR "Control*"))
74. (("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/15 AND ("Well*"))

75. ((("SEC" OR "Securities and Exchange" OR "S.E.C." OR "commission*" OR "FBI" OR "F.B.I." OR "Bureau*" OR "Federal Bureau of Investigation" OR "Fed. Bureau of Invest*" OR "Fed Bureau of Invest*" OR "DOJ" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "N.A.S.D." OR "N.A.S.D.A.Q." OR "federal*" OR "stat*" OR "government*" OR "gov't*" OR "govm*" OR "agenc*" OR "department*" OR "dep't*" OR "dept*") AND ("doc*" OR "file*" OR "filing*" OR "accout*" OR "acct*" OR "reven*" OR "earn*" OR "incom*" OR "time*" OR "timing*" OR "manip*" OR "modif*" OR "adjust*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "ICFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*"))
76. ((("SEC" OR "Securities and Exchange" OR "S.E.C." OR "FBI" OR "Bureau" OR "F.B.I." OR "DOJ" OR "Justice" OR "D.O.J." OR "Department of Justice" OR "Dep't. of Justice" OR "Dept. of Justice" OR "Dep't of Justice" OR "Dept of Justice" OR "NASD" OR "NASDAQ" OR "National") w/15 AND ("subpo*"))
77. ((("Ahmed*" OR "~~Hassan*~~" OR "Hass*") w/5 AND ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*") AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*" OR "awar*" OR "grant*" OR "vest*" OR "sale*" OR "held*" OR "hold*"))
78. ((("Ahmed*" OR "Hass*") AND ("compensat*" OR "salar*" OR "bonus*" OR "cash*"))
79. ((("Nill*" OR "Stephen*" OR "Steve") w/15 AND ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*") AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*" OR "awar*" OR "grant*" OR "vest*" OR "sale*" OR "held*" OR "hold*"))
80. ((("Steve*" OR "Stephen" OR "Nill*") AND ("compensat*" OR "salar*" OR "bonus*" OR "cash*"))
81. ((("Hemme*" OR "Peter*") w/15 AND ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*") AND ("stock*" OR "share*" OR "option*" OR "compensat*" OR "salar*" OR "bonus*") AND ("own*" OR "buy" OR "bought" OR "purchas*" OR "sell*" OR "sold" OR trad*" OR "awar*" OR "grant*" OR "vest*" OR "sale*" OR "held*" OR "hold*"))
82. ((("Pete*" OR "Peter" OR "Hemme*") AND ("compensat*" OR "salar*" OR "bonus*" OR "cash*"))
83. ((("Ahmed*" OR "Hassan*" OR "Hass*") w/15 w/30 ("chairman" OR "chair" OR "chair*") w/15 w/30 ("elect*" OR "appoint*" OR "made" OR "mak*" OR "promot*" OR "board*" OR "bd*" OR "dir*")) AND (Date > 2003) [Lead Plaintiff does not agree to date limitation]

84. ((("Hemme*" OR "Peter*" OR "Pete*") w/15 AND ("fir*" OR "term*" OR "resign*" OR "transfer*" OR "demot*" OR "remov*" OR "transf*")) AND (Date>2003)-[Lead Plaintiff does not agree to date limitation]
85. ((("Nill*" OR "Stephen*" OR "Stev*") w/15 AND ("V.P." OR "VP" OR "vice") w/15 AND ("elect*" OR "appoint*" OR "transition*" OR "made" OR "mak*" OR "demot*" OR "CFO" OR "C.F.O" OR "Chief" OR "business*" OR "operat*" OR "involuntar*" OR "voluntar*" OR "agree*")) AND (Date>2003)-[Lead Plaintiff does not agree to date limitation]
86. ((("Notini*" OR "Bert*" OR "Albert*" OR "Al*") w/15 AND ((("COO" OR ("chief" w/5 w/25 "officer") OR "president") w/15 AND ("elect*" OR "appoint*" OR "hire*" OR "retain*" OR "transition*" OR "made" OR "mak*" OR "promot*" OR "hir*" OR "select*" OR "offer*" OR "salar*" OR "bonus*" OR "option*" OR "grant*" OR "awar*" OR "rewar*"))))
87. ((("Notini*" OR "Bert*" OR "Albert*" OR "Al*") AND ("memo*" OR "analy*" OR "assum*" OR "responsib*" OR "operat*" OR "accur*" OR "restat*" OR "re-stat*" OR "letter*" OR "correspond*" OR "e-mail*" OR "email*" OR "checklist*" OR "attach*" OR "analy*" OR "scop*" OR "engag*" OR "bill*" OR "invoic*" OR "payment*" OR "check*" OR "audit*" OR "compil*" OR "meet*" OR "mtg*" OR "confer*" OR "tele*" OR "disagr*" OR "delin*" OR "refus*" OR "termin*" OR "ceas*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "ICFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR "disguis*" OR "spread*"))
88. ((("Gruber*" OR "Rubin*") w/5 AND ((("emeritus" OR "chairman" OR "chair*") w/15 AND ("elect*" OR "appoint*" OR "transition*" OR "made" OR "mak*" OR "promot*" OR "select*")))) AND (Date>2003)-[Lead Plaintiff does not agree to date limitation]
89. ("document*" w/5 ("preserv*" OR "retain*" OR "retention" OR "destr*"))
90. ((("document*" OR "polic*" OR "proced*" OR "requir*") AND ("preserv*" OR "retain*" OR "retention" OR "destr*" OR "held*" OR "hold*" OR "elimin*" OR "delet*" OR "stor*" OR "backup*" OR "back-up*"))
91. ((("board" OR "bd*" OR "directors" OR "dir*" OR "compensation committee" OR "audit committee" OR "committee*" OR "compen*") w/15 AND ("restat*" OR "re-stat*" OR "memo*" OR "letter*" OR "correspond*" OR "e-mail*" OR "email*" OR "checklist*" OR "attach*" OR "analy*" OR "scop*" OR "engag*" OR "bill*" OR "invoic*" OR "payment*" OR "check*" OR "audit*" OR "compil*" OR "meet*" OR "mtg*" OR "confer*" OR "tele*" OR "disagr*" OR "delin*" OR "refus*" OR "termin*" OR "ceas*" OR "irreg*" OR "fraud*" OR "de-fraud*" OR "defraud*" OR "misconduct*" OR "illeg*" OR "improp*" OR "ICFC" OR "control*" OR "misstat*" OR "mis-stat*" OR "mistat*" OR "miss-stat*" OR "classif*" OR "mis-classif*" OR "mistak*" OR "misrep*" OR "mis-rep*" OR "mislead*" OR "mis-lead*" OR "hid*" OR "deceiv*" OR

~~“disguis*” OR “spread*” OR “agend*” OR “video*” OR “audio*” OR “tape*” OR “taping*” OR “note*” OR “record*” OR “material*”)) [To be run only on the custodial accounts of Hassan Ahmed, Stephen Nill, Charles Gray, Rubin Gruber, Edward Anderson, Paul Ferri, Paul Severino, H. Brian Thompson, John H. Cunningham, and Albert Notini.] [Lead Plaintiff does not agree with custodial limitation]~~

92. ((“board” OR “bd*” OR “directors” OR “dir*” OR “compensation committee” OR “audit committee” OR “committee*” OR “compen*”) w/15 AND (“Qwest” OR “Quest” OR “Qwets*” OR “Quets*”)) ~~[To be run only on the custodial accounts of Hassan Ahmed, Stephen Nill, Charles Gray, Rubin Gruber, Edward Anderson, Paul Ferri, Paul Severino, H. Brian Thompson, John H. Cunningham, and Albert Notini.] [Lead Plaintiff does not agree with custodial limitation]~~

93. ((“board” OR “bd*” OR “directors” OR “dir*” OR “compensation committee” OR “audit committee” OR “committee*” OR “compen*”) w/15 AND (“AT&T” OR “ATT” OR “ATWS” OR “AT and T” OR “ATandT” OR “AWS” OR “ATTWS” OR “A T and T” OR “A T & T” OR “AT+T” OR “A T + T” OR “AT&TW*” OR “ATTW*” OR “AT+TW*” OR “Wireless” OR “Wire-less”)) ~~[To be run only on the custodial accounts of Hassan Ahmed, Stephen Nill, Charles Gray, Rubin Gruber, Edward Anderson, Paul Ferri, Paul Severino, H. Brian Thompson, John H. Cunningham, and Albert Notini.] [Lead Plaintiff does not agree with custodial limitation]~~

94. ((“estimat*” OR “project*” OR “forecast*” w/15 AND (“earning*” OR “revenue*” OR “price” OR “EPS”) w/25 AND (“sector*” OR “competitor*” OR (“informat*” w/5 “tech”) OR “telecom*” OR “VOIP” OR “voice over” OR “Sonus*” OR “SONS*”)))